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## MEMORANDUM ENDORSED

May 19, 2023

### VIA ECF

The Honorable Gregory H. Woods  
United States District Judge  
United States District Court  
Southern District of New York  
500 Pearl Street  
New York, NY 10007

USDC SDNY DOCUMENT ELECTRONICALLY FILED DOC #: DATE FILED: 5/23/2023
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**Re: *United States v. Srinivasa Kakker*a, 22 Cr. 398 (GHW)**

Dear Judge Woods:

We write on behalf of defendant Srinivasa Kakker a to respectfully request, without objection by the Government or Pretrial Services, a modification of Mr. Kakker a's conditions of release to allow him to travel within the continental United States to the extent necessary for his employment and job search without prior approval of the Court.

Mr. Kakker a's current conditions of release restrict his travel to the Southern and Eastern Districts of New York, the Northern District of California, and points in between for travel to the Court and to meet with counsel. (Dkt. 32).<sup>1</sup> Mr. Kakker a recently lost his job and is in the process of seeking other employment. The nature of Mr. Kakker a's work is such that it involves substantial travel, often on short notice. Mr. Kakker a's search for employment opportunities would be difficult if he were unable to represent to potential employers that he could travel within the continental United States as part of his job duties.

I have corresponded via e-mail with AUSA Adam Hobson, Bradley Wilson, Mr. Kakker a's Pretrial Services Officer in the Northern District of California, and Viosanny Harrison, on behalf of Pretrial Services in the Southern District of New York, and none have any objection to the proposed modification, with the condition that Mr. Kakker a notifies his supervising Pretrial Services Officer of his travels in advance of any such travel.

We therefore respectfully request that the Court modify Mr. Kakker a's conditions of release to allow him to travel within the continental United States for the purposes of his employment and his job search with the condition that he notify his Pretrial Services Officer in advance of any such travel and provide any details requested of him regarding his travel.

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<sup>1</sup> Mr. Kakker a is also permitted to travel to the Western District of Washington, the Northern District of Texas, and the Western District of Texas "for work with 72 hour notice to Pretrial Services." (Dkt. 32).

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Sincerely,




Elisha Kobre

Application granted. The conditions of Mr. Kakker's pre-trial release are modified as follows: Mr. Kakker may travel within the continental United States for the purposes of his employment and his job search. Mr. Kakker is directed to provide a detailed itinerary to pretrial services, as well as contact information during his travel. All other conditions of the defendant's pre-trial release remain in full force and effect.

The Clerk of Court is directed to terminate the motion pending at Dkt. No. 81.

SO ORDERED.

Dated: May 23, 2023  
New York, New York



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GREGORY H. WOODS  
United States District Judge